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10 *Ross Family Holdings, LLC and*  
11 *Entrepreneur Opportunity Fund I, LP*

12  
13 **IN THE UNITED STATES BANKRUPTCY COURT**  
14  
15 **FOR THE DISTRICT OF ARIZONA**

16 In re:

(In Proceedings under Chapter 7)

17 STEVE PANDI and EILEEN A  
18 QUEZADA,

Case No.: 2:16-bk-11585-SHG

19 Debtors.

20 **REPLY TO RESPONSE TO**  
21 **OBJECTION TO PROOF OF CLAIM**  
22 **NO. 17 FILED BY GEORGE PANDI**

23 Come Now, SAMT 2009, LLC, Ross Family Holdings, LLC and Entrepreneur  
24 Opportunity Fund I, LP (“Creditors”), by and through their counsel undersigned, and hereby  
25 Reply to the Response to Objection to Proof of Claim No. 17 filed by George Pandi. The  
26 Response was filed on August 1, 2017 at Docket No. 201.  
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1 In the preamble to his Response, George Pandi (Hereinafter Claimant) stated as follows:  
2 "...ask this honorable court to dismiss this objection on the basis this is not an action for the  
3 bankruptcy court..." Objectors simply state that this matter is a matter for the Bankruptcy  
4 Court. A bankruptcy was filed. Claimant filed a Proof of Claim in the bankruptcy. Claimant  
5 signed the Proof of Claim under Penalty of Perjury. Objectors filed their Objection to Proof of  
6 Claim in accordance with the relevant Bankruptcy Rules and the relevant Bankruptcy Code  
7 provisions.  
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10 **1. First Basis.**  
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12 The claimant does not specifically address objecting creditors' allegations that the debt  
13 is unenforceable under 11 U.S.C. Section 502(b)(1). Instead, Claimant makes irrelevant  
14 allegations of fact relating to a prior chapter 11 case in which the debtors were involved.  
15 Claimant has failed to meet his burden of establishing his claim is enforceable.  
16

17 **2. Second Basis.**  
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19 Claimant allegedly provided a total of loans of \$ 463,751.84 to Jumpin Jammerz LLC  
20 and Steve Pandi. He secured this obligation with numerous security instruments against  
21 Jumpin Jammerz LLC and Steve Pandi. When he took and foreclosed upon the inventory of his  
22 son's company without an appraisal or audit, and released the debt, he released both Jumpin  
23 Jammerz LLC and Steve Pandi. The debt is not enforceable and/or is satisfied and therefore  
24 should be disallowed in accordance with 11 U.S.C. Section 502(b)(1).  
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1           **3. Third Basis.**

2           The third basis is an 11 U.S.C. Section 502(d) claim relating to a pre-petition  
3 transfer recoverable under 11 U.S.C. Section 547. Claimant's allegations are  
4 unresponsive to the Objection and do not satisfy, even if true, the provisions of 11 U.S.C.  
5 Section 502(d) to pay the amount, or turnover any such property for which such entity or  
6 transferee is liable. Claimant as much as admits that "the combined security of both liens  
7 are in excess of the debt owed by the corporation....".  
8

9  
10           **4. Fourth Basis, partial release.**

11           Claimant claims that the "alleged disbursement record" (attached to his proof of claim)  
12 "is not an accounting statement by simply a reference to verify transaction IDs only and should  
13 not be treated as a statement of account for financial records." As a result, Objecting Creditor  
14 asserts that Claimant has undermined the document for purposes of validating his debt.  
15 Accordingly, without the need to reply to the piecemeal statements regarding individual  
16 amounts set forth thereafter in the response to the fourth basis, Claimant has failed to meet his  
17 burdens, and the claim should be denied.  
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21           **5. Closings**

22           In the final narrative paragraph, claimant indicates that "the objectors have failed on all  
23 basis that I have an invalid claim..." Perhaps claimant fails to understand that it is not  
24 Objectors' burden to prove an invalid claim.  
25

26           Claimant states "The objectors are well aware there is no estate for the secured or  
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28

1 unsecured creditor and that the only creditor within this case to gain any estate funds should  
2 any be available would be the IRS. This objection is purely an exercise to incur unnecessary  
3 costs an waste both my time and the courts.” Objectors assert that this is an unfair  
4 characterization of the facts. The suggestion is hereby made that claimant has it within his  
5 power to eliminate any “unnecessary costs” or “waste of time”. Claimant may do so at any  
6 time by simply withdrawing his proof of claim. The Objection would then become moot and  
7 no further litigation of the matter would be required.  
8

9  
10 **DATED** this 7th day of August, 2017.

11  
12 **GOLDMAN & ZWILLINGER PLLC**

13 /s/ Vincent R. Mayr

14 Carolyn Goldman

15 Vincent R. Mayr

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18 *Attorneys for Creditors, SAMT 2009 LLC (“SAMT”),*

19 *Ross Family Holdings, L.L.C (“Ross”) and*

20 *Entrepreneur Opportunity Fund I, LP (“EOF”)*

21 **CERTIFICATE OF SERVICE**

22 I, hereby certify that on August 7, 2017, I electronically transmitted the foregoing  
23 Objection to the Clerk’s office using the CM/ECF system for filing and transmittal of a Notice  
24 of Electronic Filing to the registrants below. In cases where no email address is provided, a full  
25 copy of this Reply to Claimant’s Response was mailed either by first class, U.S. Mail, or by  
26 First Class International Mail (in the case of Canadian addresses):

27 George Pandi

28 1 Somerset Crescent

Richmond Hill, ON L4C 8N2

Canada

*Claimant*

Full Document mailed by international mail AND sent via email this date to:

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26 /s/ Jessica Frew